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16
17 IN THE UNITED STATES DISTRICT COURT
18 FOR THE NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

18 FRANCIE E. MOELLER et al,

19 Plaintiffs,

Case No. C 02 5849 MJJ ADR

20 v.

21 TACO BELL CORP.,

22 Defendant.

**STIPULATION AND [REDACTED]
ORDER REGARDING RESPONSE TO
PLAINTIFFS' INTERROGATORIES
NOS. 2-3**

23
24
25 Case No. C 02 5849 MJJ ADR

26 Stipulation and [REDACTED] Order Regarding Response to Plaintiffs' Interrogatories Nos. 2-3

1 The parties hereby stipulate as follows:

2 Plaintiffs' Interrogatories Nos. 2-3 seek contact information (i.e. names, last job title,
3 last known address and phone numbers) concerning Taco Bell employees who worked at or
4 managed Bellwether restaurants. Defendant objected to these interrogatories on grounds of
5 privacy rights and burden. Plaintiffs have agreed to limit the scope of Interrogatory No. 2 so
6 that it seeks only information about former Taco Bell employees who, at any time during the
7 period December 2001 to the present, held the position of assistant manager or manager of a
8 Bellwether restaurant (or equivalent titles) and/or positions above the store level that supervise
9 such Bellwether restaurants. Interrogatory No. 3 seeks contact information concerning current
10 employees. Plaintiffs agree to limit Interrogatory No. 3 so that it seeks only the name and job
11 title of current management level employees, and not addresses or phone numbers.

12
13 The parties therefore stipulate that:

14 1. As limited above, defendant shall respond to the interrogatories and provide the
15 requested information no later than February 1, 2008.

16 2. Plaintiffs shall not use the requested information concerning employee addresses and
17 phone numbers for any purpose unrelated to this litigation nor shall they disclose the
18 information to anyone not involved in this litigation.

19 Respectfully Submitted,

20 THE IMPACT FUND

21
22 January 17, 2008

BY:  /S/


Brad Seligman

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24 Counsel for Plaintiffs Francie Moeller, Edward
25 Muegge, Katherine Corbett and Craig Thomas
Yates

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January 17, 2008

GREENBERG TRAURIG, LLP

BY: 
Richard H. Hikida

Counsel for Defendant Taco Bell Corp.

IT IS SO ORDERED.

DATED: 1/18/2008


The Honorable Martin J. Jenkins
United States District Court